

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

JANE DOE,

CASE NO: 1:25-cv-20757-JB

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

PLAINTIFF'S MOTION FOR LEAVE TO FILE
PROPOSED ORDER UNDER SEAL

Pursuant to Local Rule 5.4 of the Southern District of Florida, Plaintiff Jane Doe ("Plaintiff"), by and through her undersigned counsel, respectfully moves this Court for leave to file under seal the Proposed Order included in redacted form at (ECF 80-1). In support of this good cause motion, Plaintiff states as follows:

1. Plaintiff has filed a Motion for Entry of Agreed Order to Compel Lolcow LLC to Remove Videos (ECF 80), as well as a redacted Proposed Order Granting Plaintiff's Motion to Remove Videos of Jane Doe ("Proposed Order")(ECF 81-1). The Proposed Order lists the specific URLs that are still on the Kiwi Farms platform and which link to the sexually explicit Video of Plaintiff. In the redacted version of the Proposed Order at docket 81-1, these URLs have been redacted so that they do not provide access to the Video.

2. There is good cause to have the unredacted Proposed Order filed under seal. Plaintiff has suffered severe emotional and psychological harm due to the disclosure of the Video, which has been viewed by tens of thousands of people to date. In order to prevent further views of the Video and prevent further harm to Plaintiff, the Proposed Order with the URLs should be filed

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under seal. Plaintiff requests that the seal remain in place for the duration of the litigation, including any appeals, to ensure ongoing protection.

3. The Eleventh Circuit recognizes a “presumptive common law right to inspect and copy judicial records,” but this right is not absolute and may be overcome by a showing of good cause. *Romero v. Drummond Co.*, 480 F.3d 1234, 1245-46 (11th Cir. 2007). Courts balance the public’s right of access against the party’s interest in confidentiality, considering factors such as “whether allowing access would impair court functions or harm legitimate privacy interests, the degree of and likelihood of injury if made public, ... and the availability of a less onerous alternative to sealing the documents.” *Romero*, 480 F.3d at 1246; *See Jankula v. Carnival Corp.*, 2019 WL 8051719 at *2 (S.D. Fla. September 5, 2019).

4. In the instant case, good cause for sealing the URLs is unequivocally established, as the URLs are a direct link to the sexually explicit Video, implicating the substantial privacy rights of the Plaintiff under 15 U.S.C. § 6851. Public disclosure of the URLs would expose the Plaintiff to further humiliation and harassment. Additionally, these URLs help establish Defendant’s violations of 15 U.S.C. § 6851, and Plaintiff’s resulting damages, thus supporting Plaintiff’s case and her request for relief.

5. Pursuant to Local Rule 7.1(a)(2), Plaintiff met and conferred with Defendant regarding the instant motion. Defendant did not object to the Proposed Order being filed under seal.

6. Plaintiff has attached hereto as **Exhibit A** a proposed order granting this motion, in accordance with Administrative Order 2018-71 and the CM/ECF Administrative Procedures of the Southern District of Florida. The person authorized to retrieve any sealed, tangible items is: Carlos A. Garcia Perez Sanchez-Medina, Gonzalez, Quesada, Lage, Gomez & Machado, LLP 201

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WHEREFORE, Plaintiff respectfully requests that this Court grant leave to file the unredacted version of Proposed Order at Docket 81-1 under seal, to remain sealed for the duration of the litigation, including any appeals, and enter an order directing the Clerk to maintain these documents under seal.

Dated: May 21, 2025.

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/s/ Carlos A. Garcia Perez

By: _____

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Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Clerk and served via the CM/ECF filing portal on May 21, 2025, to the below counsel of record.

/s/ Carlos A. Garcia Perez
By: _____
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